

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ROBERT JONES,

Plaintiff,

-against-

**AFFIDAVIT OF  
DETECTIVE JAMES  
MEEHAN**

14-CV-6402 (KPF)

DETECTIVE JOSE CRIOLLO, POLICE OFFICER  
STEVEN MIKONLAND, DETECTIVE JAMES  
MEEHAN, LIEUTENANT FELIX RIVERA,  
DETECTIVE ADAM SAGER, AND DETECTIVE  
GREGORY THORNTON,

Defendants.  
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STATE OF NEW YORK )

SS:

COUNTY OF NEW YORK)

**DETECTIVE JAMES MEEHAN**, being duly sworn, hereby states, under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a Detective with the New York City Police Department ("NYPD"). I have been a Detective with the NYPD since 1999.

2. On December 27, 2011, I was a Detective in the Midtown South Precinct.

3. On December 27, 2011, complaining victim T.D. informed me that on December 26, 2011, when he returned to his apartment located at 616 9<sup>th</sup> Avenue, New York, New York, he found that someone had broken into his apartment.

4. Specifically, T.D. came home to find the front door of his apartment open. T.D. further informed me that upon entering the apartment he noticed that various items of his personal property were missing. T.D. reported that the following items were missing from his

apartment: 2005 Apple Macbook, 2011 Apple Macbook, Amazon Kindle, an iMac, and \$600 dollars.

5. T.D. further reported that his kitchen window, which was always kept closed, was open.

6. On December 29, 2011, I went to T.D.'s apartment to investigate the burglary. While in T.D.'s apartment, I recovered a knife that T.D. informed me did not belong to him inside of the apartment.

7. Upon information and belief, T.D.'s apartment was the only apartment that was occupied in 616 9<sup>th</sup> Avenue, New York, New York, on December 26, 2011. Further, upon information and belief, T.D.'s roommate was on vacation on December 26, 2011.

8. I also reviewed a video taken from a security camera that was in place in T.D.'s apartment building. On the video, I observed a male black on one crutch entering T.D.'s apartment building on December 26, 2011. The video also showed the black male ascend the stairs to a floor on which T.D.'s apartment was located, and then showed the same individual descend the stairs and exit the building.

9. On January 12, 2012, my investigation into the burglary of T.D.'s apartment became a part of a larger investigation into a pattern of burglaries that were occurring around the Midtown North Precinct. The reason that my investigation was added to the pattern was because of similarities between the burglaries being investigated by the Midtown North Precinct and the burglary at T.D.'s apartment.

10. The lead investigator of the pattern of burglaries was Detective Jose Criollo of the Midtown North Precinct.

11. Upon information and belief, the individual suspected in the pattern of burglaries, was, at least on one occasion, seen leaving the scene of a burglary on crutches.

12. On January 27, 2012, I was contacted by Detective Criollo who informed me that plaintiff Robert Jones had been arrested for burglary.

13. On January 27, 2012, I processed plaintiff's arrest for the burglary at T.D.'s apartment. I processed that arrest from the Midtown South Precinct.

14. At no point during January 25, 2012, through January 27, 2012, did I have any interactions with plaintiff Robert Jones.

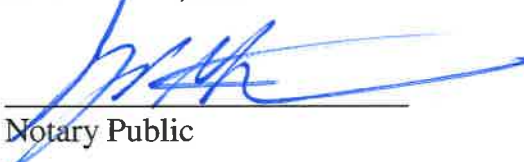
15. At no point during January 25, 2012, was I present at 571 Glenmore Ave, Brooklyn, New York, 11207.

16. At no point during January 26, 2012, was I present during the execution of the warrant at 571 Glenmore Ave, Brooklyn, New York, 11207.

Dated: New York, New York  
July 17, 2017

  
DETECTIVE JAMES MEEHAN

Sworn to before me this 17<sup>th</sup> day  
of July, 2017

  
Notary Public

JOSEPH A. GUTMANN  
Notary Public, State of New York  
Qualified in New York County  
No. 02GU6298809  
My Commission Expires 03/17/2018

